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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

October 3, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: CC Docket Nos. 96-45 and 00-256

Dear Ms. Salas:

On October 2, 2001, Ben Dickens of Blooston, Mordkofsky, Jackson and Dickens, Lisa Zaina of Wallman Strategic Consulting, LLC and I met with Commissioner Michael J. Copps and his legal advisor Jordan Goldstein to discuss the above-captioned matter. Attached is a list of more than 250 small and rural companies we represent in this matter.

We discussed the adverse public policy ramifications of adopting an impending order in the above-captioned proceeding and urged the Commissioner to consider forgoing adoption. In order to develop an appropriate record for adoption of access reform for the small and rural companies, the Commission should not adopt the proposed order, but instead issue an NPRM to allow the necessary discourse and study to take place regarding universal service, access and rate structures for the small and rural carriers. Adoption of the proposed order will not serve the interests of rural customers.

We discussed the potential increase in the Subscriber Line Charge (SLC) for rural telephone company customers. We recommended that the Commission not increase the SLCs at this time. We raised the need for understanding of the potential impact of the potential increases on universal service and the deployment of advanced services in the rural areas presently subject to rate of return regulation in contrast to those areas considered more market driven and served by carriers subject to price-cap incentive regulation.

Sincerely,

Stephen G. Kraskin

Cc: Commissioner Copps
Jordan Goldstein, Esq.

MEMBERS OF THE ALLIANCE OF
INCUMBENT RURAL INDEPENDENT TELEPHONE COMPANIES

Accucom Telecommunications, Georgia
Adams Telephone Cooperative, Illinois
Albion Telephone Co. (ATC Communications), Idaho
Alenco Communications, Inc., Texas
Alpine Communications, Iowa
Armstrong Telephone Company of Maryland
Armstrong Telephone Company of New York
Armstrong Telephone Company of Pennsylvania
Ayrshire Farmers Mutual Telephone Co., Iowa
Armstrong Telephone Company of West Virginia
Ballard Rural Telephone Cooperative Corporation, Inc., Kentucky
Barry County Telephone Company, Michigan
Bay Springs Telephone Co., Inc., Mississippi
Beehive Telephone Company, Utah
Bentleyville Communications Corporation, Pennsylvania
Berkshire Telephone Company, New York
Bixby Telephone Company, Oklahoma
Brindlee Mountain Telephone Co., Inc., Alabama
Bruce Telephone Company, Mississippi
Bulloch Telephone Cooperative, Georgia
Campti-Pleasant Hill Telephone Co., Louisiana
Canby Telephone Association, Oregon
Cap Rock Telephone Cooperative, Inc., Texas
Cascade Utilities, Oregon
Central Arkansas Telephone Co-op., Inc.
Central Montana Communications, Inc., Montana
Central Scott Telephone Co., Iowa
Champlain Telephone Company, New York
Chester Telephone Company, South Carolina
Chickamagua Telephone Company, Georgia
China Telephone Co., Maine
Citizens Telephone Company, Georgia
Citizens Telephone Company of Hammond, N.Y., Inc, New York
Clear Lake Independent Telephone Company, Iowa
Climax Telephone Co., Michigan
Coalfields Telephone Company, Kentucky
Coleman County Telephone Cooperative, Texas
Colorado Valley Telephone Cooperative, Inc., Texas
Comanche County Telephone Company, Texas
Com South Telecommunications, Inc., Georgia

Consolidated Telephone Co., Nebraska
Consolidated Telecom., North Dakota
Copper Valley Telephone Company, Arizona
Crockett Telephone Co., Inc., Tennessee
Cumby Telephone Co-op, Texas
Darien Telephone Company, Georgia
Davies Martin County Rural Telephone Corporation, Indiana
Decatur Telephone Co., Mississippi
The Deerfield Farmers' Telephone Company, Michigan
DeKalb Telephone Cooperative, Tennessee
Delhi Telephone Company, New York
Delta Telephone Co., Inc., Mississippi
Dunkirk & Fredonia Telephone Co., New York
Eagle Telephone System, Inc., Oregon
East Ascension Telephone Co., Inc., Louisiana
Egyptian Telephone Cooperative Association, Illinois
Ellijay Telephone Company, Georgia
Empire Telephone Corporation, New York
ENMR Telephone Cooperative, New Mexico
ETEX Telephone Cooperative, Texas
Farmers Telephone Cooperative, Inc., South Carolina
Five Area Telephone Cooperative, Inc., Texas
Flat Rock Telephone Co-operative, Illinois
Franklin Telephone Co., Inc., Mississippi
Fulton Telephone Co., Mississippi
Georgetown Telephone Company, Mississippi
Germantown Telephone Company, Inc., New York
Gervais Telephone Co., Oregon
Gila River Telecommunications, Inc., Arizona
Glenwood Telephone Company, Georgia
Great Plains Communications, Inc., Nebraska
Gridley Telephone Co., Illinois
GTC, Inc. d/b/a GTCom, Florida
Hancock Rural Telecom, Indiana
Hardy Telecommunications, Inc., West Virginia
Heart of Iowa Telecommunications Cooperative, Iowa
Hickory Telephone Company, Pennsylvania
Hinton Telephone Co., Inc. Oklahoma
Home Telephone Co., Illinois
Hopper Telephone LLC, Alabama
Horry Telephone Cooperative, Inc. South Carolina
Kaplan Telephone Company, Inc., Louisiana
Kingdom Telephone Company, Missouri
Lackawaxen Telephone Co., Pennsylvania
LaFourche Telephone Company, Louisiana

La Harpe Telephone Co., Inc., Illinois
Lakeside Telephone Company, Mississippi
Leaco Rural Telephone Cooperative, Inc., New Mexico
Ligonier Telephone Co., Inc., Indiana
Lincolnvill Telephone Company, Maine
Lipan Telephone Co., Texas
Lockhart Telephone Company, South Carolina
Maine Telephone Co., Inc., Maine
Mark Twain Rural Telephone Co., Missouri
McDonough Telephone Cooperative, Illinois
Mid Century Telephone Cooperative, Illinois
Middleburgh Telephone Company, New York
Mid-Maine Communications, Maine
Mid-Missouri Telephone Company, Missouri
Mid-Rivers Telephone Cooperative, Inc., Montana
Midstate Telephone Company, North Dakota
Minnesota Valley Telephone Co., Inc., Minnesota
Modern Telecommunications Company, Missouri
Molalla Communications Company, Oregon
Mon-Cre Telephone Cooperative, Inc., Alabama
Monroe Telephone Company, Oregon
Moultrie Independent Telephone Company, Illinois
Mound Bayou Telephone Company, Mississippi
Moundridge Telephone Company, Kansas
Moundville Telephone Company, Inc., Alabama
Mt. Angel Telephone Company, Oregon
Mulberry Cooperative Telephone, Indiana
National Telephone Co. of Alabama, Inc., Alabama
The Nebraska Central Telephone Company, Nebraska
Nehalem Telephone and Telegraph Co., Oregon
Nelson Telephone Cooperative, Wisconsin
Nemont Telephone Cooperative, Montana
New Paris Telephone Co., Indiana
New Windsor Telephone Co., Inc., Illinois
Nortex Communications, Texas
North Central Telephone Cooperative, Tennessee
Northeast Missouri Rural Telephone Company, Missouri
Northeast Nebraska Telephone Company, Nebraska
The North-Eastern Pa. Telephone Co., Pennsylvania
Northland Telephone Co., Inc., Maine
Northland Telephone Co., Vermont
North Pittsburgh Telephone Co., Pennsylvania
North State Communications, North Carolina
North Texas Telephone Co., Texas
Northwest Communications Cooperative, North Dakota

Northwest Telephone Cooperative Association, Iowa
Noxapater Telephone Company, Mississippi
Oklahoma Telephone and Telegraph, Oklahoma
Oneida County Telephone Company, New York
Oneida Telephone Exchange & Cablevision, Inc., Illinois
Ontario Telephone Co., New York
Otelco Telephone LLC, Alabama
Ozark Telephone Co., Inc., Missouri
Paul Bunyan Rural Telephone Cooperative, Minnesota
PBT Telecom, Inc., South Carolina
Peoples Mutual Telephone Cooperative, Iowa
Peoples Telecommunications, Kansas
Peoples Telephone Co., Inc., Tennessee
Perry-Spencer Rural Telephone Cooperative, Inc., Indiana
Piedmont Rural Telephone Cooperative, South Carolina
Pine Telephone System, Inc. Oregon
Pioneer Telephone Cooperative, Oklahoma
Pioneer Telephone Cooperative, Oregon
Plant Telephone Company, Georgia
Planters Rural Telephone Co-op, Georgia
Poka Lambro Telephone Cooperative, Inc., Texas
Polar Communications, North Dakota
Preston Telephone Co., Iowa
Progressive Rural Telephone Cooperative, Inc., Georgia
Project Telephone Company, Montana
Reserve Telephone Co., Inc. Louisiana
Reynolds Telephone Company, Illinois
Ridgeway Telephone Company, South Carolina
Ringgold Telephone Company, Georgia
Rio Virgin Telephone Company, Nevada
Riviera Telephone Company, Inc., Texas
Roanoke Telephone Co., Inc., Alabama
Roosevelt County Rural Telephone Cooperative, New Mexico
RT Communications, Wyoming
Ruthven Telephone Exchange Co., Iowa
Rye Telephone Company, Colorado
Salina-Spavinaw Telephone Company, Inc., Oklahoma
Sanborn Telephone Cooperative/Sancom, Inc., South Dakota
San Carlos Apache Telecommunications Utility, Inc., Arizona
Scio Mutual Telephone Association, Oregon
Scott County Telephone, Inc. Oklahoma
Seneca-Goodman Telephone Co., Missouri
Sherburne County Rural Telephone Company, Minnesota
Sidney Telephone Co., Maine
Siskiyou Telephone, California

Skyline Telephone Cooperative, North Carolina
Sledge Telephone Co., Mississippi
Smithville Telephone Company, Indiana
Smithville Telephone Company, Mississippi
South Central Utah Telephone Association, Inc., Utah
Southeastern Indiana Rural Telephone Cooperative, Indiana
South Park Telephone Co., Colorado
South Plains Telephone Cooperative, Inc., Texas
Southwest Texas Telephone Company, Texas
Springport Telephone Co., Michigan
Spruce Knob Seneca Rocks Telephone Co., West Virginia
Standish Telephone Co., Maine
Stayton Cooperative Telephone Company, Oregon
Surry Telephone Membership Corporation, North Carolina
Taylor Telephone Cooperative, Texas
Tidewater Telephone Company, Maine
Tohono O'odham Utility Authority, Arizona
Topsham Telephone Company, Inc., Vermont
Trenton Telephone Company, Georgia
Triangle Telephone Cooperative Association, Inc., Montana
Trumansburg Telephone Co., New York
Tularosa Basin Telephone Co., Inc., New Mexico
Utilities, Inc., Maine
Valley Telecommunications, Montana
Valley Telephone Cooperative Arizona
Valley Telephone Cooperative New Mexico
Valliant Telephone Co., Oklahoma
Van Horne Co-op Telephone Co., Iowa
Ventura Telephone Company, Iowa
Viola Home Telephone Co., Illinois
The Volcano Telephone Company, California
Waverly Hall Telephone, LLC, Georgia
West Side Telephone Company, West Virginia
West Tennessee Telephone Co., Inc., Tennessee
Wes-Tex Telephone Cooperative, Inc.
Wilkes Telephone & Electric Company, Georgia
Winnebago Cooperative Telephone Association, Iowa
Winthrop Telephone Co., Inc., Minnesota
Yukon Waltz Telephone Co., Pennsylvania

Companies And Associations Supporting Plains Rural Independent Concerns and Positions

Iowa

- | | |
|-------------------------------|------------|
| 1. Alpine Communications, LLC | Des Moines |
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Kansas

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| 1. Moundridge Telephone Co, Inc. | Moundridge |
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Nebraska

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| 1. Cambridge Telephone Co. | Cambridge |
| 2. Clarks Telecommunications Co. | Clarks |
| 3. Consolidated Telephone Co. | Lincoln |
| 4. Curtis Telephone Co. | Curtis |
| 5. Great Plains Communications | Blair |
| 6. Hamilton Telecommunications | Aurora |
| 7. Hartington Telecommunications, Inc. | Hartington |
| 8. Hershey Cooperative Telephone Co. | Hershey |
| 9. Hooper Telephone Co. | Remson, IA |
| 10. HunTel Systems, Inc. | Blair |
| 11. K&M Telephone Co. | Chambers |
| 12. Nebraska Central Telephone Co. | Gibbon |
| 13. Northeast Nebraska Telephone Co. | Jackson |
| 14. Pierce Telephone Co., Inc. | Pierce |
| 15. Southeast Nebraska Telephone Co. | Falls City |
| 16. Stanton Telecom, Inc. | Stanton |
| 17. Three River Telco | Lynch |
| 18. Mainstay Communications | Henderson |

Oklahoma

- | | |
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| 1. Totah Telephone Co. Inc | Ochelata |
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South Dakota Telecommunications Association (Members Include)

- | | |
|---|-------------|
| 1. Armour Independent Telephone Company | Hartford |
| 2. Baltic Telecom Cooperative | Baltic |
| 3. Beresford Municipal Telephone Company | Beresford |
| 4. Bridgewater-Canistota Independent Telephone | Hartford |
| 5. Swiftel Communications | Brookings |
| 6. Cheyenne River Sioux Tribe Telephone Authority | Eagle Butte |
| 7. Dakota Community Telephone | Irene |
| 8. East Plains Telecom, Inc. | Baltic |
| 9. Faith Municipal Telephone Company | Faith |
| 10. Fort Randall Telephone Company | Wagner |
| 11. Golden West Telecommunications Cooperative | Wall |
| 12. Interstate Telecommunications Cooperative | Clear Lake |
| 13. James Valley Telecommunications | Groton |
| 14. Long Lines | Jefferson |

15.	Kadoka Telephone Company	Kadoka
16.	Kennebec Telephone Company	Kennebec
17.	McCook Cooperative Telephone Company	Salem
18.	Midstate Communications	Kimball
19.	Mt. Rushmore Telephone Company	Keystone
20.	Roberts County Telephone Cooperative	New Effington
21.	RC Communications, Inc.	New Effington
22.	Santel Communications	Woonsocket
23.	Sioux Valley Telephone Company	Dell Rapids
24.	Splitrock Properties, Inc.	Brandon
25.	Splitrock Telecom Cooperative	Brandon
26.	Stockholm-Strandburg Telephone Company	Stockholm
27.	Sully Buttes Telephone Cooperative	Highmore
28.	Tri-County Telcom, Inc.	Emery
29.	Union Telephone Company	Hartford
30.	Valley Telecommunications Cooperative	Herreid
31.	West River Cooperative Telephone Company	Bison
32.	West River Telecommunications Cooperative	Mobridge
33.	Western Telephone Company	Faulkton